

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

In re Application Pursuant to 28 U.S.C. § 1782 of
OKEAN B.V. and LOGISTIC SOLUTION
INTERNATIONAL LIMITED,

Petitioners,

– to take discovery of –

CHADBOURNE & PARKE LLP,

Respondent.

Misc. No. 12-00104 (Part 1)
ECF Case

**PETITIONERS' NOTICE OF MOTION
TO COMPEL**

ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Deborah A. Skakel in Support of Petitioners' Motion to Compel, dated July 6, 2012, and the exhibits annexed thereto, the Declaration of Tom Einertsen in Support of Petitioners' Motion to Compel, dated July [6,] 2012, and the exhibits annexed thereto, Petitioners' Memorandum of Law in Support of Motion to Compel, and the prior proceedings and pleadings had herein, Petitioners Okean B.V. and Logistic Solution International Limited (together, "Okean") will move this Court before the Part 1 Judge, at the United States Courthouse located at 500 Pearl Street, New York, New York, on July 31, 2012 at 10:00 a.m., for an order pursuant to 28 U.S.C. § 1782 and Rule 37(a) of the Federal Rules of Civil Procedure compelling Chadbourne & Parke LLP ("Chadbourne") to produce documents in response to Okean's Subpoena to Produce Documents, Information, or Objects in a Civil Action, dated June 6, 2012; granting Petitioners their attorneys' fees and costs incurred in connection with this motion; and granting such other and further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule 6.1(b), Chadbourne's papers in opposition to the motion, if any, are to be served and filed no later than July 20, 2012.

Dated: New York, New York
July 6, 2012

DICKSTEIN SHAPIRO LLP

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